

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

R. DANIEL BRADY ET AL.,)	
)	
Plaintiffs,)	
)	Civil Action No. 5:09-CV-00449-BO
v.)	
)	
XE SERVICES LLC ET AL.,)	
)	
Defendants.)	
_____)	

CORPORATE DEFENDANTS' RESPONSE TO PLAINTIFFS' DISCOVERY MOTION

Defendants Xe Services LLC, Blackwater Security Consulting LLC, U.S. Training Center, Inc., Raven Development Group LLC, GSD Manufacturing LLC, Prince Group, LLC, Total Intelligence Solutions LLC, Greystone Limited a/k/a Greystone Ltd., Terrorism Research Center, Incorporated, Technical Defense Associates, Incorporated, Aviation Worldwide Services, L.L.C., Guardian Flight Systems LLC, Presidential Airways, Inc., STI Aviation, Inc., Air Quest, Inc., Samarus Co. Ltd., and Erik Prince (collectively, the "Corporate Defendants") respectfully submit this response to Plaintiffs' Motion for Leave to Conduct Jurisdictional Discovery.

The Corporate Defendants take no position on the merits of the jurisdictional dispute between Plaintiffs and Defendant Jeremy Ridgeway. However, the Corporate Defendants do not believe that discovery is needed to resolve the issue. It is not clear from Plaintiffs' motion and memorandum what discovery they believe would shed light on the issue of personal jurisdiction and whether they are seeking materials in the possession of the Corporate Defendants. Accordingly, the Corporate Defendants reserve their rights to object to such discovery if and when Plaintiffs request materials in their possession.

Dated: February 16, 2010

Respectfully submitted,

By: /s/ Eric H. Cottrell

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Samarus Co. Ltd. and Erik Prince*

CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Eric H. Cottrell

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